



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
ONE CONGRESS STREET, SUITE 1100
BOSTON, MA 02114-2023**

August 16, 2007

Mr. Richard W. Gates, Remediation Project Manager
Corporate Environmental Programs
General Electric Company
159 Plastics Avenue
Pittsfield, MA 01201

Via Electronic and U.S. Mail

Re: Conditional Approval of General Electric's December 7, 2006, submittal titled *Hill 78 & Building 71 On-Plant Consolidation Areas Ambient Air Monitoring Data Validation Report* and its January 30, 2007, submittal titled *Hill 78 & Building 71 On-Plant Consolidation Areas Tier III Ambient Air Monitoring Data Validation Report*, GE-Pittsfield/Housatonic River Site, Pittsfield, Massachusetts.

Dear Mr. Gates:

This letter provides the Environmental Protection Agency's (EPA) approval of GE's December 7, 2006, submittal titled *Hill 78 & Building 71 On-Plant Consolidation Areas Ambient Air Monitoring Data Validation Report* and its January 30, 2007, submittal titled *Hill 78 & Building 71 On-Plant Consolidation Areas Tier III Ambient Air Monitoring Data Validation Report* ("the DV Reports"). This letter is subject to the terms and conditions specified in the Consent Decree (CD) that was entered in U.S. District Court on October 27, 2000.

Pursuant to Paragraph 73 of the CD, EPA, after consultation with the Massachusetts Department of Environmental Protection (MDEP), approves the DV Reports, subject to the following conditions:

1. EPA's Pesticide/PCB Data Validation Functional Guidelines – Part III, drafted February 2004, includes certain elements for conducting data validation which GE has incorporated in Validation Annex F of the March 2007 revisions to the Field Sampling Plan/Quality Assurance Project Plan. Two other elements, however, were not incorporated in Validation Annex F and were not implemented as part of GE's validation of OPCA ambient air monitoring data.
 - a. GE's data validation did not evaluate a sensitivity check using either method detection limits (MDLs) and/or laboratory fortified blank (LFB). However, although not included as an element of GE's data validation, laboratory MDL study reports were provided to EPA upon request.
 - b. GE's data validation did not calculate the percent difference between results from the initial and confirmation column (compound quantitation). Therefore, GE shall consider including, in its data validation activities for the OPCA ambient air

monitoring data, a calculation of the percent difference between results of the initial and confirmation column analyses.

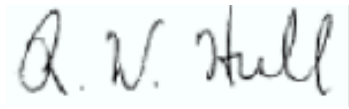
2. GE shall include the following information in the tables that present the results from the OPCA air monitoring:
 - a. In tables that present the results received since the last report, for each set of samples collected on a given date, list each sample location and ID number and provide, for each such sample, the results (in $\mu\text{g}/\text{m}^3$) for each detected Aroclor as well as for total PCBs.
 - b. In the Analytical Data Validation Summary tables, for the data evaluated, please include each sample location and ID number, provide the qualification information for any specific Aroclor (as well as total PCBs) for which the results are qualified, and present the qualified results in consistent units with those used in the other tables (i.e., $\mu\text{g}/\text{m}^3$ as well as $\mu\text{g}/\text{PUF}$).
 - c. In the year-to-date summary tables, to simplify comparison to notification and action levels, sample ID numbers and results for specific Aroclors should not be listed; rather, for each sample location, results should be presented for total PCBs (in $\mu\text{g}/\text{m}^3$). For these tables, GE should use the same format that it has been used previously in monthly updates and reports (prior to the July 2007 update and monthly report).
3. Specific details regarding the collection pump timer malfunction, specifically the elapsed pump times, for the qualified data results from May 26, 2006, and August 15, 2006, were not provided in the DV Reports. To the extent that additional details are available, this type of information should be included so that the appropriateness of the data qualifications can be determined.
4. The DV Reports did not address the field blank contamination ("FB") qualification applied to results of the samples collected on October 10-11, 2006. An explanation of the circumstances surrounding the application of the qualification to the sample results should be provided.
5. Some specific Aroclors were qualified as non-detect because the sample patterns did not match the patterns of the Aroclor standards. In all future data reporting and validation, GE shall qualify sample results of this nature as estimated "J".

Conditions 1 through 4 above shall be considered and incorporated, as appropriate and relevant, into all future submittals presenting the results of data validation activities for the OPCA air monitoring. Condition 5 shall be implemented upon receipt of this letter for the quantification and reporting of all future air sampling results.

EPA reserves all of its rights under the CD, including but not limited to, the right to perform additional sampling and/or require additional sampling or Response Actions, if necessary, to meet the requirements of the CD.

If you have any questions, please contact me at (617) 918-1882.

Sincerely,

A handwritten signature in blue ink that reads "R. W. Hull". The signature is written in a cursive style with a vertical line at the end.

Richard W. Hull
GE Facility Project Manager

cc:

Dean Tagliaferro, EPA
John Kilborn, EPA
Rose Howell, EPA
Holly Inglis, EPA
Sue Steenstrup, MDEP
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